



## INTEROFFICE MEMORANDUM

DATE: November 16, 1999

TO: J. R. Cable, K-H, Bldg 115, X7489

FROM: S. M. Nesta, K-H/ESS, T130C, X6386 *S M Nesta*

SUBJECT: NEPA DETERMINATION FOR SUBSTATIONS 132 & 515/516  
DEMOLITION - SMN-149-99

I have reviewed the project for the demolition of Substations 132 and 515/516, and the removal of the transmission lines, and poles. I understand that the project also includes the removal of substation fencing, fence posts and foundations, transformer concrete pads, ground grid, ground rods, and power poles.

The following environmental compliance comments are provided by Laurie Gregory-Frost. Questions regarding these comments should be directed to Laurie at X3681.

Removal of the power poles will be required in IHSSs 133.1 through 133.4 (currently Buffer Zone Operable Unit, previously Operable Unit 5) located to the west and southwest of the Original Landfill (IHSS 115). In other areas, leaving the below-grade portions of the power poles (including poles preserved with creosote) in place is an acceptable industrial practice. The subsequent reasons further clarify this practice.

Soil action levels for cresols are not identified in RFCA Attachment 5, Rocky Flats Environmental Technology Site Action Levels and Standards Framework for Surface Water, Groundwater, and Soils (ALF). Other likely constituents in creosote (i.e., acenaphthene, chrysene, and naphthalene) have Tier II open space action levels for surface soils of  $1.15E+05$ ,  $6.14E+02$ , and  $7.68E+04$  mg/kg, respectively. If calculated, the action levels for cresols would be similar in magnitude. The semi-volatile organic compounds that are likely constituents of the creosote on power poles do not readily migrate into or through soils. Based on discussions with Subject Matter Experts on ALF, leaving the below-grade portions of the power poles in-place in the referenced areas (excluding IHSSs) will not create a source of contamination that would later require remediation.

The following comments are provided by Greg Sollner. Questions regarding these comments should be directed to Greg at X3541.

**ADMIN RECORD**

- SAFE AND COMPLIANT CLOSURE -

IA-A-001536

It appears that RFETS is not characterizing or managing the transformer. The project must ensure all pertinent retrofill data and characterization data is provided to PSCo in support of their management of this item.

The soil disturbance activity associated with this project will require a soil disturbance permit and the appropriate characterization and management of those soils.

The following comments are provided by Ian Paton. Questions regarding these comments should be directed to Ian at X2680.

Removal of utility poles in the vicinity of the old landfill will cause soil disturbance in the vicinity of IHSSs 115, 196, and 133.1-133.4. These IHSSs are associated with depleted uranium (which impacts the RFCA total uranium water quality standard). If sampling results indicate soil within the IHSSs is contaminated above acceptable soil action levels, then two actions should occur:

- 1) a berm or diversion should be installed to prevent surface water run-on into the area of exposed contaminated soil, and
- 2) while waiting to treat or otherwise manage the exposed contaminated soil, it should have a berm placed on the downhill side (or be placed in a container) to prevent contaminated surface water from running off the contaminated soil and into the Site drainages.

Water collected from within the excavations (i.e., stormwater or groundwater infiltration) should be collected and managed in accordance with the Control and Disposition of Incidental Waters procedure (1-C91-EPR-SW.01). The Surface Water contact for this program is Sue Barker (x3114). Portable pumps for de-watering the excavation and poly tanks for temporary containment of the water can be obtained by contacting Russ Cirillo (x5876). An alternative approach would be to transport and treat all water collected in the excavations at the Consolidated Water Treatment Facility (B891) without waiting to analyze the water quality.

Where non-contaminated soil is exposed from excavation (i.e., the substation 515 and 516 demolition), berms to capture the runoff are not necessary, but downstream water quality protective measures should still be implemented. These typically include silt fences (for broad expanses of disturbed soil) or hay bales located in the drainage swales downstream from the disturbed soil.

Surface water runoff from the area near the old landfill flows to the South Interceptor Ditch (SID), which is part of the Woman Creek watershed. Runoff in the SID is monitored and sampled at station SW027 (located just upstream from Pond C-2). Runoff from the 515/516 demolition site is monitored and sampled at station SW093 (located in the North Walnut Creek watershed).

No other environmental compliance issues are noted for this project.

With regard to the NEPA documentation for the project, I recommend that the project be categorically excluded from further NEPA documentation requirements, pending resolution of the aforementioned issues. Attached is a copy of the draft Categorical Exclusion (CX) Determination for the project, which should not be transmitted to DOE until the above concerns are addressed. Please review the project description portion of the draft CX Determination for accuracy and completeness. Pending any changes you request, this document should be transmitted to RFFO's NEPA Compliance Officer (John Morris) with a request for a final NEPA determination on the project. To maintain tracking of NEPA projects, please copy me on your transmittal to RFFO, at which time we will forward an electronic copy of the CX to Mr. Morris for his use.

If changes arise that alter the scope of the project, please contact me so that we can review the changes for NEPA compliance. Please do not hesitate to contact me at X6386 if you have any questions or need additional information.

cc:

Karan North, K-H  
Ted Hopkins, RMRS  
file

<DATE>

99-RF-XXXX

J. Morris, NEPA Compliance Officer  
DOE, RFFO

NATIONAL ENVIRONMENTAL POLICY ACT (NEPA) DOCUMENTATION FOR  
[PROJECT NAME] - YYY-XXX-99

Attached is a draft categorical exclusion for the subject project. Kaiser-Hill NEPA staff recommend that this project be categorically excluded from further NEPA documentation requirements. A draft Categorical Exclusion Determination is included for your review and an electronic copy of the draft Determination has been made available to you.

Please provide a final NEPA determination for this project at your earliest convenience. If you have any questions or need additional information, please contact [PROJECT CONTACT AND EXTENSION].

**SAMPLE**

Name, Director  
Division

XXX:xxx

Orig. and 1 cc - J. Morris

Attachments:  
As Stated (1).

cc:  
S. M. Nesta, K-H

**DOE NEPA REGULATIONS SUBPART D**  
**CATEGORICAL EXCLUSION (CX) DETERMINATION - RFFO/CX00-99**

**Proposed Action:** Demolition of Substations 132 and 515/516

**Location:** Rocky Flats Environmental Technology Site, Golden, CO

**Proposed by:** U.S. Department of Energy Rocky Flats Field Office (DOE, RFFO)

**Description of the Proposed Action:**

The Rocky Flats Field Office (RFFO) proposes to demolish Substations 132 and 515/516, and remove selected power poles and transmission lines. The transmission line parallels the west access road on the south side of the access road to a point east of Seventh Street, and then proceeds north to Substation 132 at Central Avenue. A line (tapped into the transmission line) that crosses the access road to Substation 132 will also be removed. Power poles will be cut to grade, excepting those within the boundaries of any IHSS and the substation fencing. In addition, substation fencing, fence posts and foundations, transformer concrete pads, ground grid, and ground rods will be removed.

**Categorical Exclusion to be Applied:**

B4.10 Deactivation, dismantling, and removal of electric powerlines, substations, switching stations, and other transmission facilities, and right-of-way abandonment.

**Justification:**

The purpose of this project is to deactivate, dismantle and remove substations, powerlines, and associated equipment, as is provided for in B4.10.

In accordance with 10 CFR 1021.410(b), the project (1) fits within the class of actions listed in Subpart D of Appendix B of 10 CFR 1021, (2) exhibits no extraordinary circumstances that may affect the significance of its environmental effects, and (3) is not "connected" (per 40 CFR 1508.25[a][1]) to other actions with potentially significant impacts, is not related to other proposed actions with cumulatively significant impacts (per 40 CFR 1508.25[a][2]), and is not precluded by 40 CFR 1506.1 or 10 CFR 1021.211.

Further, in accordance with 10 CFR 1021, Subpart D, Appendix B, the project would not (1) threaten a violation of applicable statutory, regulatory, or permit requirements for environment, safety, and health, including requirements of DOE and/or Executive Orders, (2) require siting and construction or major expansion of waste storage, disposal, recovery, or treatment facilities (including incinerators), (3) disturb hazardous substances, pollutants, contaminants, or CERCLA-excluded petroleum and natural gas products that

preexist in the environment such that there would be uncontrolled or unpermitted releases; or (4) adversely affect environmentally sensitive resources.

**I have determined that the proposed action meets the requirements for a categorical exclusion as defined in Subpart D of 10 CFR 1021. Therefore, I approve the categorical exclusion of the proposed action from further NEPA review and documentation.**

Date: \_\_\_\_\_

Signature: \_\_\_\_\_

RFFO NEPA Compliance Officer